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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KEVIN MEAGHER on behalf of himself and
REBECCA DAWSON on behalf of
themselves and all other similarly situated
individuals,

Plaintiffs,

v.

KTC HOLDING COMPANY f/k/a THE
KINGDOM TRUST COMPANY,

Defendant.

CASE NO. 2:24-cv-01630-CDC-MDC

**STIPULATION AND PROPOSED ORDER
TO EXTEND TIME TO RESPOND TO
FIRST AMENDED COMPLAINT**

(SECOND REQUEST)

Plaintiffs KEVIN MEAGHER and REBECCA DAWSON, on behalf of themselves and all other similarly situated individuals (“Plaintiffs”), and Defendant KTC HOLDING COMPANY, formerly known as THE KINGDOM TRUST COMPANY (“Defendant” and together with Plaintiffs, the “Parties”), by and through counsel, and pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, hereby stipulate and agree as follows:

WHEREAS, Plaintiffs filed their First Amended Complaint on November 8, 2024 (ECF No. 13), making the deadline to respond to the amended complaint November 25, 2024;

WHEREAS, on November 25, 2024, this Court entered an order granting the Parties’ joint stipulation to extend the time to respond to the First Amended Complaint (ECF No. 15), making Defendant’s response deadline January 17, 2025.

WHEREAS, the Parties are actively engaged in settlement negotiations, and request additional time to explore potential early resolution of this matter.

WHEREAS, the Parties have agreed to an extension of time for Defendant to respond to the amended complaint, namely, February 21, 2025, to allow the Parties to continue ongoing settlement discussions;

NOW, THEREFORE, in consideration of the foregoing, the Parties hereby STIPULATE and AGREE that the deadline for Defendant to respond to the amended complaint is February 21, 2025.

The Parties represent this stipulation is made in good faith and not for the purposes of delay.

IT IS SO STIPULATED.

Dated this 3rd day of January, 2025.

Dated this 3rd day of January, 2025.

/s/ Eric W. Swanis

/s/ Kennedy M. Brian

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IT IS SO ORDERED.

Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Date: 1/6/25